

September 29, 2004

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Irene Flannery
Universal Service Administrative Company
2120 L Street, N.W., Suite 600
Washington, D.C. 20037

Re: CC Docket No. 96-45
State Certification of USF in Rural Areas

Dear Mses. Dortch and Flannery:

This letter is submitted pursuant to 47 CFR §54.314(a), which requires annual state certification of the use of federal universal service funds as a prerequisite for continued receipt of funding by rural carriers. The Regulatory Commission of Alaska governs local services and rates in Alaska and is the appropriate authority to issue the certification required under Section 54.314(a).

We declare that, to the best of our knowledge and belief, all federal high cost support received in 2004 by economically regulated rural eligible telecommunications carriers in Alaska (see attached list) will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act.

We economically regulate Arctic Slope Telephone Association Cooperative, Inc (ASTAC), but only for its Barrow exchange. Our agency does not economically regulate ASTAC's exchanges other than the Barrow exchange, Circle Telephone, Cordova Telephone, Ketchikan Public Utilities, and Nushagak Electric & Telephone Cooperative. Our certification does not cover non-regulated wireline service areas and each carrier is responsible for self-certifying its compliance with Section 54.314(b) for such areas.

We have included Alaska DigiTel, LLC and ACS Wireless, Inc., non-regulated wireless carriers, on our list of carriers. We have done so as we directed the companies to file annual certifications with us concerning their use of funds and we plan to regularly review their responses in this area. Alaska DigiTel, LLC and ACS Wireless, Inc. should be filing individual certifications with the FCC concerning the use of funds by a non-regulated entity.

We have pending a number of local carrier revenue requirements and cost of service study proceedings. Our certification does not preclude us from reviewing in further detail how any carrier has employed its federal universal service funds and ordering that use of funds comply with our directives or policies. Our decision does not bind us in future or pending cases and we reserve the right to conclude that a company should employ its universal service funding differently than it does today or in the future in light of better data or a more detailed review.

Sincerely,
REGULATORY COMMISSION OF ALASKA

Kate Giard
Chairman

Rural Eligible Telecommunications Carriers in Alaska¹

NECA Code ²	Carrier
613012, 613022	ACS of Alaska, Inc.
613008	ACS of Fairbanks, Inc.
613010, 613020	ACS of the Northland, Inc.
N/A	ACS Wireless, Inc. ³
N/A	Alaska DigiTel, LLC ⁴
613017, 613009	Alaska Telephone Company
613001, 613009	Arctic Slope Telephone Assoc. Cooperative, Inc. ⁵
613002	Bettles Telephone Company
613003	Bristol Bay Telephone Cooperative, Inc.
613004	Bush-Tell, Inc.
613006	Copper Valley Telephone Cooperative, Inc.
N/A	GCI Communications Corp. ⁶
613011, 613009	Interior Telephone Company
613015	Matanuska Telephone Assoc., Inc.
613016, 613009	Mukluk Telephone Company
613026	North Country Telephone, Inc.
613019	OTZ Telephone Cooperative., Inc.
613028	Summit Telephone Company
613023, 613009	United-KUC, Inc.
613023	United Utilities, Inc.
613025	Yukon Telephone Company

¹This list does not include incumbent rural ETCs that are not economically regulated by the Regulatory Commission of Alaska. Those carriers are required to self-certify in accordance with 47 CFR §54.314(b). Non-economically incumbent rural ETCs in Alaska are Circle Telephone, Cordova Telephone, Ketchikan Public Utilities, Nushagak Electric & Telephone Cooperative, and Arctic Slope Telephone Association Cooperative, Inc. (ASTAC) for its exchanges other than Barrow (see footnote 5).

²With the exception of Alaska DigiTel (see footnote 4) and ACS Wireless (see footnote 3), each local carrier has ETC status in all rural study areas that it serves. The study area codes are provided as a convenience. Code 613009 refers to previous exchanges owned by GTE Alaska, Inc. that were divided up and transferred to several different entities. These exchange have since been merged with each carrier's other study area(s)

³ACS Wireless, Inc. is a wireless carrier that was granted status for areas served by Matanuska Telephone Company, Inc. (613015) and ACS of Fairbanks, Inc. (613008).

⁴Alaska DigiTel, LLC is a wireless carrier that was granted ETC status for the area served by Matanuska Telephone Company, Inc. (613015).

⁵The Regulatory Commission of Alaska only economically regulates ASTAC for its Barrow exchange. For its non-economically regulated exchanges, ASTAC is responsible for filing a letter directly with the FCC indicating its intent to use federal high cost funds only for their intended purposes.

⁶GCI holds ETC status in the following incumbent study areas: Fairbanks (613008), Juneau (613012), and Greatland (613022). However, this certification only covers the Fairbanks and Juneau areas. GCI provides service to the Greatland study area via wholesale.